

Jefferson Co. Circuit Court Kevin Poe, Clerk 765 Justice Center Dr., Ste. 2 Dandridge, TN 37725 (865) 397-2786	<div style="font-size: 1.5em; margin-bottom: 5px;">11/21/2022</div> <h2 style="margin: 0;">STATE OF TENNESSEE</h2> <h3 style="margin: 0;">CIVIL SUMMONS</h3> <p style="margin: 0;">PAGE 1 OF 1</p>	Case Number <div style="font-size: 1.5em; margin-top: 10px;">27482-IV</div>
Karen Waldron vs. Health Supply US, LLC		

Served On:

Health Supply US, LLC Registered Agent: Corporation Service Company, 2626 Glenwood Ave., Ste. 550, Raleigh, NC 27608

You are hereby summoned to defend a civil action filed against you in Circuit Court, Knox County, Tennessee. Your response must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 11/21/2022

JH
Clerk / Deputy Clerk

Attorney for Plaintiff: Jeffrey C. Taylor, Esq.
 TAYLOR Law Firm, 365 W 3rd North St, Morristown, TN 37814

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to: Kevin Poe, Circuit Clerk, Jefferson County
 765 Justice Center Drive, Ste. 2, Dandridge, TN 37725

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

 Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.	
I certify that I have served this summons together with the complaint as follows: _____ _____	
Date: _____	By: _____ <small>Please Print: Officer, Title</small>
_____ <small>Agency Address</small>	_____ <small>Signature</small>

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires: _____)

Signature of Plaintiff _____

Plaintiff's Attorney (or Person Authorized to Serve Process)
 (Attach return receipt on back)

EXHIBIT
1

ADA: If you need assistance or accommodations because of a disability, please call _____, ADA Coordinator, at () _____.

Def Copy

IN THE CIRCUIT COURT FOR JEFFERSON COUNTY, TENNESSEE

KAREN WALDRON,

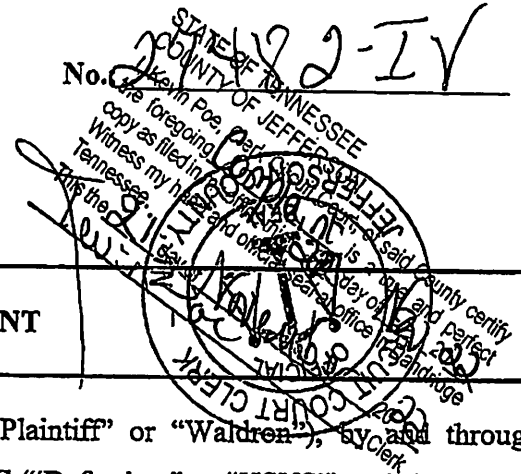
Plaintiff,

v.

HEALTH SUPPLY US, LLC,

Defendant.

No. 20-2-IV



COMPLAINT

COMES now the Plaintiff, Karen Waldron ("Plaintiff" or "Waldron"), by and through counsel, and sues Defendant, Health Supply US, LLC ("Defendant" or "HSUS") and shows unto the Court, as follows:

1. This action arises from Defendant's breach of contract with Plaintiff, pursuant Tennessee common law.
2. Plaintiff is a resident of Jefferson County, Tennessee, residing at 776 McKenzie Drive, Dandridge, Tennessee 37725.
3. Defendant is a North Carolina Limited Liability Company with its principal place of business located at 205 Raceway Drive, Suite 3, Mooresville, North Carolina 28117. Defendant can be served with process through its registered agent at Corporation Service Company, 2626 Glenwood Avenue, Suite 550, Raleigh, North Carolina 27608.
4. On or about April 20, 2020, Plaintiff and Defendant entered into an employment agreement, confirmed in writing.
5. At all times material hereto, Defendant is engaged in manufacturing, identifying, sourcing and delivering essential safety and medical supplies, including personal protective equipment ("PPE") through United States government contracts for the benefit of front line workers.
6. At all times material hereto, Plaintiff was hired by Defendant as the Defendant's Director of Operations.

FILED 11/21 20 22
AT 9:00 O'CLOCK P.M.
KEVIN POE, CLERK

7. As Director of Operations, Plaintiff reported directly to Defendant's CEO, Christopher Garcia.

8. As Director of Operations for Defendant, Plaintiff's duties and responsibilities included completing contract bid work with the United States government for the purposes of manufacturing and delivery of PPE of a various nature, and overseeing production of the contracted PPE materials.

9. Defendant contracted with Plaintiff for Plaintiff's services as Director of Operations of Defendant for an agreed base salary of \$120,000.00 per year, paid biweekly at \$4,615.38, plus bonus payments paid in an amount based upon the fulfillment of the Defense Logistics Agency ("DLA") contract(s).

10. On or about September 2020, Defendant received delivery orders of certain PPE totaling \$500,962,308.00, which was reduced to \$47,699,892.00 by late September 2020. As Director of Operations, Plaintiff engaged in significant work on behalf of Defendant to fulfill Defendant's obligations pursuant to the aforementioned DLA orders. The majority of the work Plaintiff performed on the DLA orders and contracts were performed by Plaintiff in Jefferson County, Tennessee.

11. Based on the terms of Plaintiff's employment agreement with Defendant, Defendant was to pay Plaintiff bonus money on the DLA contract in the amount of \$500,000.00. The Defendant agreed to pay Plaintiff's bonus money upon receipt of the contract payment from Defendant's customer, DLA.

12. To date, Defendant has paid Plaintiff the agreed base salary, but has only paid Plaintiff bonus money of \$304,872.75. Defendant has breached its employment agreement with Plaintiff by failing to pay Plaintiff the balance of the bonus monies due in the amount of \$195,127.25, plus accrued and unused vacation days in the amount of \$2,500.00.


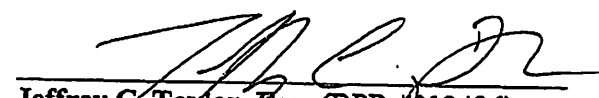
13. Plaintiff avers that the above-mentioned DLA contract has been fulfilled and completed and that Defendant has received payment related to the contract in the amount of \$47,699,892.00.

14. As a result of Defendant's breach of the employment agreement between the parties hereto, Plaintiff has been damaged in that Defendant has withheld from Plaintiff the contractual

benefits, including bonus monies and vacation pay which Defendant was obligated to pay Plaintiff pursuant to the parties written agreement and communications and of which Plaintiff relied upon in the completion of her duties to Defendant.

WHEREFORE, Plaintiff demands judgment from the Court against Defendant for bonus payment and vacation payment in the total amount of \$197,627.25.

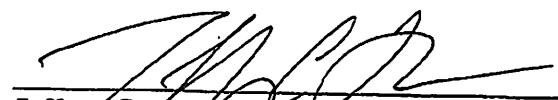
Respectfully submitted this 18th day of November, 2022.


Karen Waldron
Jeffrey C. Taylor, Esq. (BPR #013436)
TAYLOR LAW FIRM
365 West Third North Street
Morristown, Tennessee 37814
(423) 586-6812
jeff@taylorlawfirmtn.com

Attorney for Plaintiff, Karen Waldron

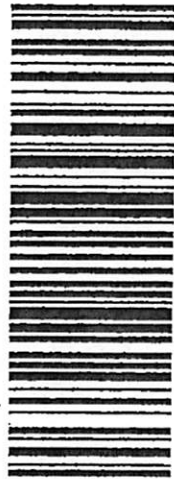
COST BOND

We acknowledge ourselves as sureties in this cause for the bill of costs.


Jeffrey C. Taylor for
Taylor Law Firm, Surety

CERTIFIED MAIL®

TAYLOR LAW FIRM
365 WEST THIRD NORTH STREET
P.O. BOX 2004
MORRISTOWN, TN 37816-2004



7020 3160 0001 9982 8039



RDC 99



27608

U.S. POSTAGE PAID
FCM LETTER
MORRISTOWN, TN
37814
NOV 29, 22
AMOUNT

\$7.85

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Health Supply US, LLC
Attn: Corporation Service Co.
2626 Glenwood Ave., Ste. 550
Raleigh, NC 27608